

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**vs.**

**JESUS ROJAS HERNANDEZ**

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§

**CRIMINAL NO.: 4:21-CR-00072  
Judge Alfred Bennett**

**UNOPPOSED  
MOTION TO CONTINUE TRIAL**

The defendant, JESUS ROJAS HERNANDEZ, by and through his attorney of record, Adrian Almaguer, hereby moves the Court for an order continuing the trial in the above entitled cause as follows:

**I.**

This case is presently scheduled for trial on the merits on Monday, September 1, 2021, at 9:00 a.m..

Defense counsel has been appointed to represent Mr. Rojas Hernandez after the federal public defender withdrew from the case.

Defense counsel for the defendant respectfully advises the court that additional time is needed to complete his review of the government's discovery materials and to confer with the defendant with regard to the said discovery materials.

Defense counsel will require a minimum of at least 60 days to complete his review of the government's discovery and decide whether or not to attempt to enter into a written plea agreement with the government.

Defense counsel for the defendant, respectfully requests that the Court enter a new scheduling order and continue this case for at least sixty days.

II.

Defense counsel has conferred with AUSA Stephanie Bauman regarding this continuance and advises the Court that counsel for the government does not oppose this motion.

This motion for continuance is not being filed merely for the purpose of delay but so that justice may be done.

For these reasons, the defendant respectfully requests that the Court grant this motion to continue the trial on the merits and enter a new scheduling order.

Respectfully submitted this 24th day of August, 2021.

/S/ Adrian Almaguer

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing defendant's Unopposed Motion to Continue the Trial was forwarded by e-mail transmission, to AUSA Stephanie Bauman on August, 2021, and promptly filed with the Court via CM/ECF filing.

/S/ Adrian Almaguer

Adrian Almaguer  
Counsel for Defendant

**CERTIFICATE OF CONFERENCE**

I certify that I have conferred with counsel for the government regarding the filing and disposition of this motion for continuance and she is unopposed to the filing and granting of this motion.

/s/ Adrian Almaguer  
Adrian Almaguer